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Michele Malloy Senior Corporate Attorney

March 21, 1989

Ms. Jennifer Decker
Mail Code T-4-3
U.S. EPA - Region IX
215 Fremont Street
San Francisco, California 94105

Re: Coalinga, California Asbestos Removal

Dear Ms. Decker:

As I mentioned in our telephone conference earlier this month, it was my understanding that 5% of Coalinga Asbestos Company was owned by Herbert Hoover, Jr. I have now unearthed correspondence dated May 30, 1967 from Kern County Land Company to its counsel at the McCutchen, Doyle firm indicating the exact share ownership in Coalinga Asbestos Company. The sole pertinent page from that correspondence is attached.

sincerely, Michele Malloy (CA)

MM:cd Attachment

cc: Mr. Roger Pearson
General Attorney
Southern Pacific Transportation Company
One Market Plaza

San Francisco, California 94105

Notes:

(1) Shares of Kern (Philippines), Inc. issued to:

Alberto M. Meer*	40
Antonio M. Meer*	40
John J. Hartmann*	40
Ralph M. Arms*	40
William T. Balch*	40
	200

- * 39 shares assigned to Kern County Land Company legal title to 1 share held in trust for KCL as qualifying share
- (2) Not included in the above list are:
 - (a) J. I. Case Company and its subsidiaries and sub-subsidiaries.
 - (b) Walker Manufacturing Company and its subsidiaries and sub-subsidiaries.
 - (c) Watkins-Johnson Company.
 - (d) Agricultural By-Products Company, incorporated in California on July 12, 1961; no shares issued.
 - (e) Coalinga Asbestos Company, Inc., incorporated in Delaware on December 7, 1960. Share ownership:

Herbert Hoover, Jr. 50 shares Johns-Manville Sales Corporation Kern County Land Company 150 shares

- (f) Moonie Pipeline Company Pty. Ltd., incorporated in Queensland, Australia on January 29, 1963. Kern County Canal and Water Company owns 168,000 shares or 40% of the 420,000 shares issued.
- (g) KCL Communications Company, incorporated in California on July 16, 1955 as non-profit corporation.
- (h) KCL Foundation, incorporated in California on December 19, 1960 as non-profit corporation.